

**U.S. District Court  
Northern District of Texas (Dallas)  
CIVIL DOCKET FOR CASE #: 3:17-cv-02318-N**

Exxon Mobil Corporation v. Internal Revenue Service  
Assigned to: Judge David C Godbey  
Related Case: 3:16-cv-02921-N-BH  
Cause: 05:552 Freedom of Information Act

Date Filed: 08/31/2017  
Jury Demand: None  
Nature of Suit: 895 Other Statutes:  
Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**Exxon Mobil Corporation**

represented by **Emily A Parker**  
Thompson & Knight LLP  
1722 Routh Street  
Suite 1500  
Dallas, TX 75201  
214-969-1502  
Fax: 214-880-3184  
Email: [emily.parker@tklaw.com](mailto:emily.parker@tklaw.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Jennifer Meghan Nylin**  
Thompson & Knight LLP  
1722 Routh Street, Suite 1500  
Dallas, TX 75201  
214-893-2844  
Fax: 214-969-1751  
Email: [meghan.nylin@tklaw.com](mailto:meghan.nylin@tklaw.com)  
**ATTORNEY TO BE NOTICED**

**Leonora Susan Meyercord**  
Thompson & Knight LLP  
1722 Routh Street, Suite 1500  
Dallas, TX 75201  
214-969-1315  
Fax: 214-999-1590  
Email: [Lee.Meyercord@tklaw.com](mailto:Lee.Meyercord@tklaw.com)  
**ATTORNEY TO BE NOTICED**

**Mary A McNulty**  
Thompson & Knight LLP  
1722 Routh St  
Suite 1500  
Dallas, TX 75201  
214-969-1187  
Fax: 214-880-3182  
Email: [Mary.McNulty@tklaw.com](mailto:Mary.McNulty@tklaw.com)  
**ATTORNEY TO BE NOTICED**

**William Mayer Katz , Jr**  
Thompson & Knight LLP  
1722 Routh St  
Suite 1500  
Dallas, TX 75201-2533  
214-969-1330  
Fax: 214-880-3279 FAX  
Email: [william.katz@tklaw.com](mailto:william.katz@tklaw.com)  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**Internal Revenue Service**

represented by **Richard Jeremy Hagerman**  
 United States Department of Justice  
 PO Box 227, Ben Franklin Station  
 Washington, DC 20044  
 202-616-9832  
 Fax: 202-514-6866  
 Email: [Richard.j.hagerman@usdoj.gov](mailto:Richard.j.hagerman@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Katherine Reinhart**  
 United States Department of Justice – Tax  
 Division  
 PO Box 227  
 Washington, DC 20044  
 202-307-6528  
 Fax: 202-514-6866  
 Email: [Katherine.Reinhart@usdoj.gov](mailto:Katherine.Reinhart@usdoj.gov)  
**ATTORNEY TO BE NOTICED**

**Stephen Shuching Ho**  
 United States Department of Justice – Tax  
 Division  
 PO Box 227  
 Ben Franklin Station  
 Washington, DC 20044  
 202-616-8994  
 Fax: 202-514-6866  
 Email: [stephen.s.ho@usdoj.gov](mailto:stephen.s.ho@usdoj.gov)  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
08/31/2017	<u>1</u>	COMPLAINT against Internal Revenue Service filed by Exxon Mobil Corporation. (Filing fee \$400; Receipt number 0539-8640406) Plaintiff will submit summons(es) for issuance. In each Notice of Electronic Filing, the judge assignment is indicated, and a link to the <u>Judges Copy Requirements</u> is provided. The court reminds the filer that any required copy of this and future documents must be delivered to the judge, in the manner prescribed, within three business days of filing. Unless exempted, attorneys who are not admitted to practice in the Northern District of Texas must seek admission promptly. Forms, instructions, and exemption information may be found at <a href="http://www.txnd.uscourts.gov">www.txnd.uscourts.gov</a> , or by clicking here: <u>Attorney Information – Bar Membership</u> . If admission requirements are not satisfied within 21 days, the clerk will notify the presiding judge. (Attachments: # <u>1</u> Cover Sheet) (Katz, William) (Entered: 08/31/2017)
08/31/2017	<u>2</u>	NOTICE of Related Case ( <i>No. 3:16-cv-2921-N</i> ) re: <u>1</u> Complaint filed by Exxon Mobil Corporation (Katz, William) (Entered: 08/31/2017)
08/31/2017	<u>3</u>	CERTIFICATE OF INTERESTED PERSONS/DISCLOSURE STATEMENT by Exxon Mobil Corporation. (Katz, William) (Entered: 08/31/2017)
08/31/2017	<u>4</u>	Request for Clerk to issue Summons upon United States of America by service upon John A. Koskinen, Commissioner, Internal Revenue Service filed by Exxon Mobil Corporation. (Katz, William) (Entered: 08/31/2017)
08/31/2017	<u>5</u>	Request for Clerk to issue Summons upon United States of America by service upon Jeff Sessions, Attorney General of the United States filed by Exxon Mobil Corporation. (Katz, William) (Entered: 08/31/2017)
08/31/2017	<u>6</u>	Request for Clerk to issue Summons upon United States of America by service upon Civil Process Clerk, United States Attorney filed by Exxon Mobil Corporation. (Katz, William) (Entered: 08/31/2017)

08/31/2017	<u>7</u>	New Case Notes: A filing fee has been paid. Pursuant to Misc. Order 6, Plaintiff is provided the Notice of Right to Consent to Proceed Before A U.S. Magistrate Judge (Judge Ramirez). Clerk to provide copy to plaintiff if not received electronically. (ykp) (Entered: 08/31/2017)
08/31/2017	<u>8</u>	Summons issued as to Internal Revenue Service, U.S. Attorney, and U.S. Attorney General. (ykp) (Entered: 08/31/2017)
09/01/2017	<u>9</u>	RESPONSE filed by Internal Revenue Service re: <u>2</u> Notice (Other) (Hagerman, Richard) (Entered: 09/01/2017)
09/05/2017	<u>10</u>	TRANSFER ORDER: This civil action is hereby TRANSFERRED to the docket of United States District Judge David Godbey. Going forward, this case will be designated by the letter suffix "N," rather than the letter suffix "M." (ash) (Ordered by Chief Judge Barbara M.G. Lynn on 9/5/2017) (ash) (Entered: 09/05/2017)
09/15/2017	<u>11</u>	NOTICE of Attorney Appearance by Katherine Reinhart on behalf of Internal Revenue Service. (Filer confirms contact info in ECF is current.) (Reinhart, Katherine) (Entered: 09/15/2017)
09/25/2017	<u>12</u>	SUMMONS Returned Executed as to Internal Revenue Service ; served on 9/12/2017. (Attachments: # <u>1</u> Additional Page(s) Service by certified mail c/o John A. Koskinen, Commissioner) (Nylin, Jennifer) (Entered: 09/25/2017)
09/25/2017	<u>13</u>	SUMMONS Returned Executed. (Attachments: # <u>1</u> Additional Page(s) Service by certified mail upon Jeff Sessions, Attorney General for the United States) (Nylin, Jennifer) (Entered: 09/25/2017)
09/25/2017	<u>14</u>	SUMMONS Returned Executed as to Internal Revenue Service ; served on 9/7/2017. (Attachments: # <u>1</u> Additional Page(s) Service by certified mail upon Civil Process Clerk, United States Attorney) (Nylin, Jennifer) (Entered: 09/25/2017)
10/04/2017	<u>15</u>	ORDER REQUIRING STATUS AND SCHEDULING CONFERENCE: The parties are directed to confer within 14 days of the date of this Order regarding the following matters, and report to the Court within 14 days after the conference the parties' position. (Ordered by Judge David C Godbey on 10/4/2017) (ams) (Entered: 10/05/2017)
10/06/2017	<u>16</u>	Unopposed Motion for Extension of Time to File Answer filed by Internal Revenue Service (Attachments: # <u>1</u> Proposed Order extending answer deadline through October 24, 2017.) (Hagerman, Richard) (Entered: 10/06/2017)
10/10/2017	<u>17</u>	ELECTRONIC ORDER granting <u>16</u> Motion for Extension of Time to File Answer. Internal Revenue Service answer due 10/24/2017. (Ordered by Judge David C Godbey on 10/10/2017) (chmb) (Entered: 10/10/2017)
10/23/2017	<u>18</u>	Joint Motion for Extension of Time to File Answer filed by Internal Revenue Service (Attachments: # <u>1</u> Proposed Order) (Hagerman, Richard) (Entered: 10/23/2017)
10/27/2017	<u>19</u>	AMENDED COMPLAINT against Internal Revenue Service filed by Exxon Mobil Corporation. Unless exempted, attorneys who are not admitted to practice in the Northern District of Texas must seek admission promptly. Forms, instructions, and exemption information may be found at <a href="http://www.txnd.uscourts.gov">www.txnd.uscourts.gov</a> , or by clicking here: <a href="#">Attorney Information – Bar Membership</a> . If admission requirements are not satisfied within 21 days, the clerk will notify the presiding judge. (Katz, William) (Entered: 10/27/2017)
11/01/2017	<u>20</u>	Joint STATUS REPORT and Rule 26(f) Report filed by Internal Revenue Service. (Hagerman, Richard) (Entered: 11/01/2017)
11/03/2017	<u>21</u>	ELECTRONIC ORDER granting <u>18</u> Motion for Extension of Time to File Answer Internal Revenue Service answer or response is due 11/9/2017. (Ordered by Judge David C Godbey on 11/3/2017) (chmb) (Entered: 11/03/2017)
11/07/2017	<u>22</u>	ORDER: The parties are ordered to file a joint status report on the status of this case by 1/8/2018. (Ordered by Judge David C Godbey on 11/7/2017) (aaa) (Entered: 11/07/2017)

11/09/2017	<u>23</u>	ANSWER to <u>19</u> Amended Complaint,, filed by Internal Revenue Service. Unless exempted, attorneys who are not admitted to practice in the Northern District of Texas must seek admission promptly. Forms, instructions, and exemption information may be found at <a href="http://www.txnd.uscourts.gov">www.txnd.uscourts.gov</a> , or by clicking here: <a href="#">Attorney Information – Bar Membership</a> . If admission requirements are not satisfied within 21 days, the clerk will notify the presiding judge. (Hagerman, Richard) (Entered: 11/09/2017)
11/09/2017	<u>24</u>	CERTIFICATE OF INTERESTED PERSONS/DISCLOSURE STATEMENT by Internal Revenue Service. (Hagerman, Richard) (Entered: 11/09/2017)
01/08/2018	<u>25</u>	Joint STATUS REPORT filed by Internal Revenue Service. (Hagerman, Richard) (Entered: 01/08/2018)
03/08/2018	<u>26</u>	Joint STATUS REPORT filed by Internal Revenue Service. (Hagerman, Richard) (Entered: 03/08/2018)
05/08/2018	<u>27</u>	Joint MOTION for Extension of Time to File Joint Status Report filed by Internal Revenue Service and Exxon Mobil Corporation. (Attachments: # <u>1</u> Proposed Order) (Hagerman, Richard) Modified text/filers on 5/8/2018 (dsr). (Entered: 05/08/2018)
05/11/2018	<u>28</u>	ELECTRONIC ORDER granting <u>27</u> Motion for Extension of Time to File Joint Status Report. Status Report due by 5/11/2018. (Ordered by Judge David C Godbey on 5/11/2018) (chmb) (Entered: 05/11/2018)
05/11/2018	<u>29</u>	Joint STATUS REPORT filed by Exxon Mobil Corporation. (Meyercord, Leonora) (Entered: 05/11/2018)
06/06/2018	<u>30</u>	MOTION to Set Production Schedule filed by Exxon Mobil Corporation with Brief/Memorandum in Support. (Attachments: # <u>1</u> Proposed Order, # <u>2</u> Exhibit(s) 1, # <u>3</u> Exhibit(s) 2, # <u>4</u> Exhibit(s) 3, # <u>5</u> Exhibit(s) 4, # <u>6</u> Exhibit(s) 5, # <u>7</u> Exhibit(s) 6, # <u>8</u> Exhibit(s) 7, # <u>9</u> Exhibit(s) 8, # <u>10</u> Exhibit(s) 9) (Nylín, Jennifer) (Entered: 06/06/2018)
06/13/2018	<u>31</u>	MOTION for Extension of Time to File Response/Reply to <u>30</u> MOTION to Set Production Schedule filed by Internal Revenue Service (Attachments: # <u>1</u> Proposed Order) (Hagerman, Richard) (Entered: 06/13/2018)
06/14/2018	<u>32</u>	Notice of Correction of Signature Omission, correcting signature omission in <u>31</u> Motion for Extension of Time to File Response/Reply filed by Internal Revenue Service. (Hagerman, Richard) (Entered: 06/14/2018)
06/15/2018	<u>33</u>	ELECTRONIC ORDER granting <u>31</u> Motion to Extend Time to File Response/Reply. The IRS's response to Plaintiff's Motion to Set Production Schedule is due by July 6, 2018. (Ordered by Judge David C Godbey on 6/15/2018) (chmb) (Entered: 06/15/2018)
07/06/2018	<u>34</u>	RESPONSE filed by Internal Revenue Service re: <u>30</u> MOTION to Set Production Schedule (Attachments: # <u>1</u> Appendix containing Declaration of Donald Squires; Declaration of Denise Higley, and June 4, 2018 Article) (Hagerman, Richard) (Entered: 07/06/2018)
07/09/2018	<u>35</u>	Joint STATUS REPORT filed by Internal Revenue Service, Exxon Mobil Corporation. (Hagerman, Richard) Modified filer on 7/10/2018 (awc). (Entered: 07/09/2018)
07/20/2018	<u>36</u>	REPLY filed by Exxon Mobil Corporation re: <u>30</u> MOTION to Set Production Schedule (Nylín, Jennifer) (Entered: 07/20/2018)
09/07/2018	<u>37</u>	Joint STATUS REPORT filed by Exxon Mobil Corporation. (Meyercord, Leonora) (Entered: 09/07/2018)
11/13/2018	<u>38</u>	<b>***DISREGARD, WRONG PDF/ATTORNEY RE-FILED AS DOCUMENT NO. 39 ***</b> Joint STATUS REPORT filed by Internal Revenue Service. (Hagerman, Richard) Modified on 11/14/2018 (zkc). (Entered: 11/13/2018)
11/13/2018	<u>39</u>	Joint STATUS REPORT filed by Internal Revenue Service. (Hagerman, Richard) Modified docket text on 11/14/2018 (zkc). (Entered: 11/13/2018)
01/09/2019	<u>40</u>	MOTION to Stay filed by Internal Revenue Service (Attachments: # <u>1</u> Proposed Order staying case and setting deadline for next Joint Status Report) (Hagerman, Richard) (Entered: 01/09/2019)

01/10/2019	<u>41</u>	RESPONSE filed by Exxon Mobil Corporation re: <u>40</u> MOTION to Stay (Attachments: # <u>1</u> Proposed Order) (Nylin, Jennifer) (Entered: 01/10/2019)
01/15/2019	<u>42</u>	STATUS REPORT filed by Exxon Mobil Corporation. (Nylin, Jennifer) (Entered: 01/15/2019)
01/30/2019	<u>43</u>	NOTICE of <i>Restoration of Appropriations</i> filed by Internal Revenue Service (Ho, Stephen) (Entered: 01/30/2019)
02/08/2019	44	ELECTRONIC ORDER finding as moot <u>40</u> Motion to Stay per <u>43</u> . (Ordered by Judge David C Godbey on 2/8/2019) (chmb) (Entered: 02/08/2019)
03/18/2019	<u>45</u>	Joint MOTION for Extension of Time to File Joint Status Report filed by Exxon Mobil Corporation (Meyercord, Leonora) (Entered: 03/18/2019)
03/19/2019	46	ELECTRONIC ORDER granting <u>45</u> Motion for Extension of Time to File. The Joint Status Report is to be filed by 3/25/2019. (Ordered by Judge David C Godbey on 3/19/2019) (chmb) Docket text modified on 3/19/2019 (twd). (Entered: 03/19/2019)
03/25/2019	<u>47</u>	Joint STATUS REPORT filed by Exxon Mobil Corporation. (Katz, William) (Entered: 03/25/2019)
03/26/2019	<u>48</u>	ORDER re: <u>30</u> Motion to Set a Production Schedule. By Order dated 3/22/2019, the Court adopted a new schedule in related case 3:16-CV-02921-N: <i>Exxon Mobil Corporation v. United States of America</i> . The Court believes the new schedule moots Exxon's motion. (Ordered by Judge David C Godbey on 3/26/2019) (axm) (Entered: 03/26/2019)
04/23/2019	<u>49</u>	Joint STATUS REPORT filed by Internal Revenue Service. (Hagerman, Richard) (Entered: 04/23/2019)